

April 13, 2021

***VIA E-MAIL***

United States Environmental Protection Agency  
Region IX  
Attention: Yvezee Lapada  
75 Hawthorne Street  
San Francisco, California 94015-3901  
E-mail: lapada.yveezenikita@epa.gov

Re: Desert View Power LLC

Ladies and Gentlemen:

Desert View Power LLC (“DVP”) is in receipt of the request by the United States Environmental Protection Agency (“EPA”) for information under § 114(a) of the Clean Air Act by letter dated April 2, 2021 (the “§ 114(a) Request”). We note that the § 114(a) Request is extremely broad. While DVP will work diligently to provide the EPA with the requested information by the stated deadline, we are concerned that factors outside of our control will impact our ability to do so.

First, the DVP facility is currently without its full complement of managers. The Corporate EH&S Manager for Greenleaf Power Consolidated LLC (the owner and operator of DVP) began quarantine for COVID-19 symptoms on April 6, 2021 and tested positive for COVID-19 on April 7, 2021. As such, he will be unable to travel to the site for several weeks. This is a critical position for helping to gather, organize, and review the information required to respond to the § 114(a) Request. DVP’s Plant Manager went out for a major surgery in March 2021, and is scheduled to return at limited capacity in late April or early May 2021. DVP recently hired a new Maintenance Manager, but that person is not due to begin until mid-April 2021, and even then, will be initially focused on getting up to speed on operations at the facility. All of these positions will be critical in responding to the § 114(a) Request without undue interruption to operations.

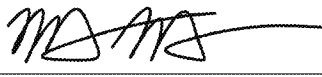
Second, DVP’s planned spring outage is scheduled for April 25, 2021 to May 10, 2021. Key personnel needed to gather the requested information are actively engaged in planning and implementing the outage. As we are so close to the planned outage and, as you know, timing of maintenance is critical to the successful operation of any facility, diverting the attention of critical staff from the outage to responding to the § 114(a) Request would materially impact operations.

Third, a large amount of the requested information is stored in paper records onsite at DVP. Even if all personnel at the facility were available to work on the response, DVP would need senior officers based in Sacramento, California to travel to the facility for the document production. While COVID-19 numbers are currently trending favorably in some areas, travel restrictions, local regulations and DVP COVID-19 safety procedures significantly impact the ability of DVP to provide a full response on the requested timeline. In particular, plant safety procedures restrict the number of people that are permitted to work in close proximity indoors in places like file rooms, conference rooms, etc.

Due to the circumstances noted above, DVP will have to deliver information in batches. We believe that we can provide the following information identified on Appendix C by the deadline requested in the § 114(a) Request: Sections 1 through 4; 7; 8; 10; and 18 through 20.

For the remainder of the information requested, DVP respectfully requests a ninety (90) day extension. Please feel free to contact Mitchell Martin at (916) 596-2514 with any questions. We look forward to receiving your response and working with you to satisfy the EPA's requests.

DESERT VIEW POWER LLC

By:   
Name: Mitchell Martin  
Title: Operations & Engineering Director

cc: Robert Hines, Farella Braun + Martel LLP  
Jonathan Dennis, Greenleaf Power  
Roshni Brahmhatt, EPA  
Denise Leong, EPA